

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

vs.

Case No. 05-cr-10053-NMG

TYRONE BATTLE

**APPLICATION FOR SERVICES: PSYCHOLOGIST
MOTION FOR ADDITIONAL FUNDS IN THE AMOUNT OF \$180.00**

Request is hereby made on behalf of Tyrone Battle to allow the payment of fees to a psychologist in excess of the \$300.00 guideline.

Such request is based upon the Declaration of Jean C. LaRocque, counsel appointed for Tyrone Battle and all pleadings in the matter herein.

DECLARATION OF JEAN C. LAROCQUE

I, Jean C. LaRocque, do hereby declare as follows:

1. I am an attorney of record in the matter herein, being the law partner of Mark W. Shea, who was appointed to represent Tyrone Battle;
2. Attorney Shea is currently on vacation out of the country;
3. In the course of preparing for the sentencing of this matter, we have enlisted the services of Eric Mart, Ph.D., a board certified forensic psychologist;
4. Mr. Battle is charged with being a felon in possession of a firearm;
5. The court has previously allowed \$1,500.00 for Dr. Mart's services, without prejudice to defendant's right to seek a modest supplement;
6. Dr. Mart conducted an evaluation of Mr. Battle at the Plymouth County Correctional Facility, which included round-trip travel to and from New Hampshire; and drafted a report, which defendant intends to use in sentencing;
7. Dr. Mart's fee for his services is \$1,680.00;
8. Based on the above, counsel for defense requests additional fees up to \$180.00, which will cover the work done on Mr. Battle's case.

I declare under penalty of perjury, under the laws of the Commonwealth of Massachusetts, that the foregoing is true and correct.

Executed this 11th day of August 2006.

/s/ JEAN C. LaROCQUE

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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on August 11, 2006.

/s/ JEAN C. LaROCQUE

Jean C. LaRocque